

**network access device through which, upon a successful authentication and authorization of an end user device to the computer network, the end user device can obtain access to network resources, said authentication, authorization and access request comprising a requesting network access device description and a plurality of service requests indicative of computer services for which the requesting network access device requests provisioning;**  
**wherein the requesting network access device description includes one or more of: a requesting network access device vendor, a requesting network access device type and a requesting network access device version; and**  
**forwarding, to an authentication, authorization and access-control server, said authentication, authorization and access request for authentication and authorization of the end user device to the computer network.**

It is well founded that to establish a *prima facie* case of obviousness under 35 U.S.C. §103(a), the references cited and relied upon must teach or suggest all the claim limitations. In addition, a sufficient factual basis to support the obviousness rejection must be proffered. *In re Freed*, 165 USPQ 570 (CCPA 1970); *In re Warner*, 154 USPQ 173 (CCPA 1967); *In re Lunsford*, 148 USPQ 721 (CCPA 1966). With respect to the present application, it is respectfully submitted that Pfizner and Amin, individually or in combination, fail to describe or suggest all the limitations of Claim 1. It is further submitted that a sufficient factual basis has not been proffered in the Office Action to support the rejection of Claim 1 under 35 U.S.C. §103(a).

Claim 1 recites one or more features that are not described or suggested by Pfizner and Amin, individually or in combination. For example, Pfizner and Amin, individually or in combination, fail to describe or suggest “an authentication, authorization and access request... that includes the requesting network access device description... for authentication and authorization of the end user device to the computer network,” recited in Claim 1.

The Office Action acknowledges that Pfizner fails to describe authentication and authorization of a request. (Office Action: page 3) However, the Office Action alleges that Amin describes “generating authentication, authorization and access requests to obtain access to network resources,” and thus, Amin describes “a request that includes the requesting network access device description for authentication and authorization of the end user device to the computer network,” recited in Claim 1. (Office Action: page 3) This is incorrect.

Amin describes an authentication request and an authorization request, but **none of them comprises “the requesting network access device description,”** recited in Claim 1. Amin’s authentication request is sent to authenticate the user (Amin: Col. 14, ll. 13-16), not the “network access device,” as recited in Claim 1. Amin’s authentication request comprises information about the user retrieved from the user’s profile (Amin: Col. 14, ll. 16-23), not information describing the “network access device,” as claimed. Thus, Amin’s authentication request is not the “authentication, authorization and access request... that includes the requesting network access device description...,” as recited in Claim 1.

Amin’s authorization request pertains to authorizing a user’s service session, **not to “authenticating and authorizing the end user device,”** as claimed, and **does not include “the requesting network access device description,”** as recited in Claim 1. In Amin, after the user is successfully authorized to the AAA server, the user starts a service session. (Amin: Col. 14, ll. 39-41) To invoke the service session, the user sends a service session request message to an “allied application server.” (Amin: Col. 14, ll. 43-45) The service session request message contains information about the service type, the requested QoS, and the requested bandwidth. (Amin: Col. 14, ll. 16-23) However, Amin’s service session request message does not comprise “the requesting network access device description,” as recited in Claim 1. Amin’s service type information, QoS information or bandwidth information does not comprise a description of the “requesting network access device,” as recited in Claim 1, such as device vendor, device type or device version, as claimed.

The purpose of Amin’s service session request message is to authorize the service, QoS, and the requested bandwidth, **not to “authenticate and authorize the end user device to the computer network,”** as recited in Claim 1. In Amin, upon receiving the service session request message, the allied service application server sends an Authorization Request message to the AAA server to authorize the service, the QoS, and the requested bandwidth. (Amin: Col. 14, ll. 49-50) Amin’s Authorization Request contains only information about the requested service, the requested QoS and the requested bandwidth, all of which are specific to the communication

session, not to the **device**, as claimed. (Amin: Col. 14, ll. 49-50) Thus, Amin's Authorization Request carries no information for "authenticating and authorizing the end user **device**," as claimed.

Pfitzner describes some of the device description information, **but does not use any of the device description information to "authenticate and authorize the end user device to the computer network,"** as claimed. Pfitzner describes a user's computing environment information that indicates the type of the user's computing device, the size or type of a display associated with the user's device, and the amount of the storage available on the user's device. (Pfitzner: Col. 7, ll. 16-24) Based on the user's computing environment information, the user is either redirected to an URL that is customized to interface with the particular type of the user's device (Pfitzner: Col. 10, ll. 56-58), or the user receives the data that is translated, by the system, to the format compatible with the user's device (Pfitzner: Col. 12, ll. 16-28). However, none of Pfitzner's computing environment information is used "for **authentication and authorization of the end user device to the computer network**," as claimed. In fact, as acknowledged by the Office Action, Pfitzner does not perform "authentication and authorization." (Office Action: page 3)

The Office Action **fails to discuss the limitation "upon a successful authentication and authorization of an end user device to the computer network,"** recited in Claim 1, because Pfitzner and Amin, individually or in combination, fail to describe the limitation. In particular, as the Office acknowledged, Pfitzner fails to describe any type of "authentication and authorization," much less "authentication and authorization of an end user **device** to the computer network," recited in Claim 1. Amin also fails to describe "authentication and authorization of an end user **device** to the computer network," recited in Claim 1, because Amin only authorizes a user and a user's session, not "an end user **device**," as recited in Claim 1. Therefore, Pfitzner and Amin, individually or in combination, fail to describe or suggest "upon a successful authentication and authorization of an end user **device** to the computer network," recited in Claim 1.

The Office Action alleges that it would have been obvious to implement the use of Amin's AAA requests to Pfizner's approach, and that the motivation to do so would have been common knowledge of using AAA requests to authenticate the user before granting user access to network resource. (Office Action: page 3) This is incorrect. A combination of Pfizner and Amin would lead at most to an approach in which the user, not the user's device as recited in Claim 1, has to be successfully authenticated before the user may receive the requested resources. In sharp contrast, Claim 1 recites "authentication and authorization of the end user **device**," not of the user as in Amin.

Moreover, Claim 1 recites "authentication and authorization of the end user device using the requesting network access **device description** [that] includes "one or more of: a requesting network access device vendor, a requesting network access device type and a requesting network access device version," not a user's profile information as in Amin. Further, according to Claim 1, the end user device may obtain access to network resources **only upon a successful authentication** and authorization of an end user **device**, not after authentication of the user as in Amin. Therefore, any combination of Pfizner with Amin would not provide all features that are recited in Claim 1.

Reconsideration and withdrawal of the rejection is respectfully requested.

#### CLAIMS 11, 13, 19 AND 23

Claims 11, 13, 19 and 23 recite features similar to those in Claim 1. Therefore, Claims 11, 13, 19 and 23 are patentable over Pfizner for the same reasons as for Claim 1.

Reconsideration and withdrawal of the rejection are respectfully requested.

#### B. CLAIMS 2-4, 12, 14-16 AND 24-26— 35 U.S.C. § 103(e): PFIZNER, AMIN, ANDERSON

Claims 2-4, 12, 14-16 and 24-26 stand rejected under 35 U.S.C. § 103(a) as allegedly anticipated by Pfizner et al., U.S. Patent No. 7,506,069 ("Pfizner") in view of Amin and in further view of Anderson et al., U.S. Patent No. 7,089,316 ("Anderson"). (Office Action: page 10) This rejection is respectfully traversed.

Claims 2-4, 12, 14-16 and 24-26 depend from Claims 1, 11, 13, 19 and 23, respectively. As discussed above, Claim 1 (11, 13, 19 and 23, respectively) recites at least one feature that is not disclosed in Pfitzner and Amin, individually or in combination. Further, Anderson does not cure the deficiencies of Pfitzner and Amin with respect to Claim 1(11, 13, 19 and 23) because Anderson does not anticipate “generating an access request by a requesting network access device, through which an end user device can obtain access to network resources, and which is forwarded for authentication and authorization, wherein the requesting network access device description includes one or more of: a requesting network access device vendor, a requesting network access device type and a requesting network access device version,” as recited in Claim 1. Therefore, for the foregoing reasons and additionally due to claim dependency, Pfitzner, Amin and Anderson, individually or in combination, fail to describe or suggest the whole subject matter recited in Claims 2-4, 12, 14-16 and 24-26.

Reconsideration and withdrawal of the rejection is respectfully requested.

#### C. DEPENDENT CLAIMS

The claims that are not discussed above depend directly or indirectly on the claims that have been discussed. Therefore, those claims are patentable for the reasons given above. In addition, each of the dependent claims separately introduces features that independently render the claim patentable. However, due to the fundamental differences already identified, and to expedite positive resolution of the examination, separate arguments are not provided for each of the dependent claims at this time.

#### II. CONCLUSION

For the reasons set forth above, all pending claims are in condition for allowance. A petition for an extension of time is hereby made to the extent necessary to make this reply timely filed. If any applicable fee is missing or insufficient, the Commissioner is authorized to charge

any applicable fee to our Deposit Account No. 50-1302.

Respectfully submitted,

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